

"Economic Analysis of Section 337: The Balance Between Intellectual Property Protection and Protectionism," (with J. Ordover) 1990.

"Privatization to Limit Public Sector Discretion," (with Carl Shapiro) 1989.

"Arming Decisions Under Asymmetric Information," 1989.

"Regulation of Information Services," 1987.

"The Effects of Capped NTS Charges on Long Distance Competition," (with M. Katz).

"The Revolution in Telephone Communications Policy."

"Discussion of Regulatory Mechanism Design in the Presence of Research Innovation, and Spillover Effects," 1987.

"Industry Economic Analysis in the Legal Arena," 1987.

"Deregulation of Long Distance Telephone Services: A Public Interest Assessment," (with M. Katz).

"Competition-Related Trade Issues," report prepared for OECD.

"Herfindahl Concentration Index," (with J. Ordover), Memorandum for ABA Section 7 Clayton Act Committee, Project on Revising the Merger Guidelines, March 1981.

"Market Power and Market Definition," (with J. Ordover), Memorandum for ABA Section 7 Clayton Act Committee, Project on Revising the Merger Guidelines, May 1981.

"The Continuing Need for and National Benefits Derived from the REA Telephone Loan Programs - An Economic Assessment," 1981.

"The Economics of Equipment Leasing: Costing and Pricing," 1980.

"Rail Deregulation and the Financial Problems of the U.S. Railroad Industry," (with W.J. Baumol), report prepared under contract to Conrail, 1979.

"Price Indexes and Intertemporal Welfare," Bell Laboratories Economics Discussion Paper, 1974.

"Consumer's Surplus: A Rigorous Cookbook," Technical Report #98, Economics Series, I.M.S.S.S., Stanford University, 1973.

"An Economic-Demographic Model of the Housing Sector," (with B. Hickman and M. Hinz), Center for Research in Economic Growth, Stanford University, 1973.

Invited Conference Presentations:

Economic Development Institute of the World Bank -- Program on Competition Policy

"Policy Towards Horizontal Mergers" 1998

Twenty-fifth Anniversary Seminar for the Economic Analysis Group of the Department of Justice

"Market Definition in Antitrust Analysis" 1998

HIID International Workshop on Privatization, Regulatory Reform and Corporate Governance

"Infrastructure Architecture and Regulation: Railroads" 1998

EU Committee Competition Conference – Market Power

"US/EC Perspective on Market Definition" 1998

Federal Trade Commission Roundtable

"Antitrust Policy for Joint Ventures" 1998

1998 Antitrust Conference

"Communications Mergers" 1998

The Progress and Freedom Foundation Conference on Competition, Convergence, and the Microsoft Monopoly

"Access and Bundling in High-Technology Markets" 1998

FTC Program on The Effective Integration of Economic Analysis into Antitrust Litigation

"The Role of Economic Evidence and Testimony" 1997

FTC Hearings on Classical Market Power in Joint Ventures

"Microeconomic Analysis and Guidelines" 1997

World Bank Economists' Week IV "Making Markets More Effective With Competition Policy"	1997
Brookings Trade Policy Forum "Competition Policy and Antidumping: The Economic Effects"	1997
University of Malaya and Harvard University Conference on The Impact of Globalisation and Privatisation on Malaysia and Asia in the Year 2020 "Microeconomics, Privatization, and Vertical Integration"	1997
ABA Section of Antitrust Law Conference on The Telecommunications Industry "Current Economic Issues in Telecommunications"	1997
Antitrust 1998: The Annual Briefing "The Re-Emergence of Distribution Issues"	1997
Inter-American Development Bank Conference on Private Investment, Infrastructure Reform and Governance in Latin America & the Caribbean "Economic Principles to Guide Post-Privatization Governance"	1997
Harvard Forum on Regulatory Reform and Privatization of Telecommunications in the Middle East "Privatization: Methods and Pricing Issues"	1997
American Enterprise Institute for Public Policy Research Conference "Discussion of Local Competition and Legal Culture"	1997
Harvard Program on Global Reform and Privatization of Public Enterprises "Infrastructure Privatization and Regulation: Freight"	1997
World Bank Competition Policy Workshop "Competition Policy for Entrepreneurship and Growth"	1997
Eastern Economics Association Paul Samuelson Lecture "Bottleneck Access in Regulation and Competition Policy"	1997
ABA Annual Meeting, Section of Antitrust Law "Antitrust in the 21st Century: The Efficiencies Guidelines"	1997
Peruvian Ministry of Energy and Mines Conference on Regulation of Public Utilities "Regulation: Theoretical Context and Advantages vs. Disadvantages"	1997

The FCC: New Priorities and Future Directions "Competition in the Telecommunications Industry"	1997
American Enterprise Institute Studies in Telecommunications Deregulation "The Scope of Competition in Telecommunications"	1996
George Mason Law Review Symposium on Antitrust in the Information Revolution "Introduction to the Economic Theory of Antitrust and Information"	1996
Korean Telecommunications Public Lecture "Market Opening and Fair Competition"	1996
Korea Telecommunications Forum "Desirable Interconnection Policy in a Competitive Market"	1996
European Association for Research in Industrial Economics Annual Conference "Bottleneck Access: Regulation and Competition Policy"	1996
Harvard Program on Global Reform and Privatization of Public Enterprises "Railroad and Other Infrastructure Privatization"	1996
FCC Forum on Antitrust and Economic Issues Involved with InterLATA Entry "The Scope of Telecommunications Competition"	1996
Citizens for a Sound Economy Policy Watch on Telecommunications Interconnection "The Economics of Interconnection"	1996
World Bank Seminar on Experiences with Corporatization "Strategic Directions of Privatization"	1996
FCC Economic Forum on the Economics of Interconnection "Lessons from Other Industries"	1996
ABA Annual Meeting, Section of Antitrust Law "The Integration, Disintegration, and Reintegration of the Entertainment Industry"	1996
Conference Board: 1996 Antitrust Conference "How Economics Influences Antitrust and Vice Versa"	1996
Antitrust 1996: A Special Briefing "Joint Ventures and Strategic Alliances"	1996

New York State Bar Association Section of Antitrust Law Winter Meeting "Commentary on Horizontal Effects Issues"	1996
FTC Hearings on the Changing Nature of Competition in a Global and Innovation-Driven Age "Vertical Issues for Networks and Standards"	1995
Wharton Seminar on Applied Microeconomics "Access Policies with Imperfect Regulation"	1995
Antitrust 1996, Washington D.C. "Assessing Joint Ventures for Diminution of Competition"	1995
ABA Annual Meeting, Section of Antitrust Law "Refusals to Deal -- Economic Tests for Competitive Harm"	1995
FTC Seminar on Antitrust Enforcement Analysis "Diagnosing Collusion Possibilities"	1995
Philadelphia Bar Education Center: Antitrust Fundamentals "Antitrust--The Underlying Economics"	1995
Vanderbilt University Conference on Financial Markets "Why Do Christie and Schultz Infer Collusion From Their Data?"	1995
ABA Section of Antitrust Law Chair's Showcase Program "Discussion of Telecommunications Competition Policy"	1995
Conference Board: 1995 Antitrust Conference "Analysis of Mergers and Joint Ventures"	1995
ABA Conference on The New Antitrust: Policy of the '90s "Antitrust on the Super Highways/Super Airways"	1994
ITC Hearings on The Economic Effects of Outstanding Title VII Orders "The Economic Impacts of Antidumping Policies"	1994
OECD Working Conference on Trade and Competition Policy "Empirical Evidence on The Nature of Anti-dumping Actions"	1994
Antitrust 1995, Washington D.C. "Rigorous Antitrust Standards for Distribution Arrangements"	1994

ABA -- Georgetown Law Center: Post Chicago-Economics: New Theories - New Cases?	
"Economic Foundations for Vertical Merger Guidelines"	1994
Conference Board: Antitrust Issues in Today's Economy	
"New Democrats, Old Agencies: Competition Law and Policy"	1994
Federal Reserve Board Distinguished Economist Series	
"Regulated Private Enterprise Versus Public Enterprise"	1994
Institut d'Etudes Politiques de Paris	
"Lectures on Competition Policy and Privatization"	1993
Canadian Bureau of Competition Policy Academic Seminar Series, Toronto.	
"Public Versus Regulated Private Enterprise"	1993
CEPS Symposium on The Clinton Administration: A Preliminary Report Card	
"Policy Towards Business"	1993
Columbia Institute for Tele-Information Conference on Competition in Network Industries, New York, NY	
"Discussion of Deregulation of Networks: What Has Worked and What Hasn't"	1993
World Bank Annual Conference on Development Economics	
"Public Versus Regulated Private Enterprise"	1993
Center for Public Utilities Conference on Current Issues Challenging the Regulatory Process, Santa Fe, NM	
"The Economics of Current Issues in Telecommunications Regulation"	1992
"The Role of Markets in Presently Regulated Industries"	1992
The Conference Board's Conference on Antitrust Issues in Today's Economy, New York, NY	
"Antitrust in the Global Economy"	1992
"Monopoly Issues for the '90s"	1993
Columbia University Seminar on Applied Economic Theory, New York, NY	
"Economic Rationales for the Scope of Privatization"	1992
Howrey & Simon Conference on Antitrust Developments, Washington, DC	
"Competitive Effects of Concern in the Merger Guidelines"	1992

Arnold & Porter Colloquium on Merger Enforcement, Washington, DC "The Economic Foundations of the Merger Guidelines"	1992
American Bar Association, Section on Antitrust Law Leadership Council Conference, Monterey, CA "Applying the 1992 Merger Guidelines"	1992
OECD Competition Policy Meeting, Paris, France "The Economic Impacts of Antidumping Policy"	1992
Center for Public Choice Lecture Series, George Mason University Arlington, VA "The Economic Impacts of Antidumping Policy"	1992
Brookings Institution Microeconomics Panel, Washington, DC, "Discussion of the Evolution of Industry Structure"	1992
AT&T Conference on Antitrust Essentials "Antitrust Standards for Mergers and Joint Ventures"	1991
ABA Institute on The Cutting Edge of Antitrust: Market Power "Assessing and Proving Market Power: Barriers to Entry"	1991
Second Annual Workshop of the Competition Law and Policy Institute of New Zealand "Merger Analysis, Industrial Organization Theory, and Merger Guidelines"	1991
"Exclusive Dealing and the <u>Fisher & Paykel</u> Case"	1991
Special Seminar of the New Zealand Treasury "Strategic Behavior, Antitrust, and The Regulation of Natural Monopoly"	1991
Public Seminar of the Australian Trade Practices Commission "Antitrust Issues of the 1990's"	1991
National Association of Attorneys General Antitrust Seminar "Antitrust Economics"	1991
District of Columbia Bar's 1991 Annual Convention "Administrative and Judicial Trends in Federal Antitrust Enforcement"	1991
ABA Spring Meeting "Antitrust Lessons From the Airline Industry"	1991

Conference on The Transition to a Market Economy - Institutional Aspects "Anti-Monopoly Policies and Institutions"	1991
Conference Board's Thirtieth Antitrust Conference "Antitrust Issues in Today's Economy"	1991
American Association for the Advancement of Science Annual Meeting "Methodologies for Economic Analysis of Mergers"	1991
General Seminar, Johns Hopkins University "Economic Rationales for the Scope of Privatization"	1991
Capitol Economics Speakers Series "Economics of Merger Guidelines"	1991
CRA Conference on Antitrust Issues in Regulated Industries "Enforcement Priorities and Economic Principles"	1990
Pepper Hamilton & Scheetz Anniversary Colloquium "New Developments in Antitrust Economics"	1990
PLI Program on Federal Antitrust Enforcement in the 90's "The Antitrust Agenda of the 90's"	1990
FTC Distinguished Speakers Seminar "The Evolving Merger Guidelines"	1990
The World Bank Speakers Series "The Role of Antitrust Policy in an Open Economy"	1990
Seminar of the Secretary of Commerce and Industrial Development of Mexico "Transitions to a Market Economy"	1990
Southern Economics Association "Entry in Antitrust Analysis of Mergers"	1990
"Discussion of Strategic Investment and Timing of Entry"	1990
American Enterprise Institute Conference on Policy Approaches to the Deregulation of Network Industries "Discussion of Network Problems and Solutions"	1990

American Enterprise Institute Conference on Innovation, Intellectual Property, and World Competition	
"Law and Economics Framework for Analysis"	1990
Banco Nacional de Desenvolvimento Economico Social Lecture	
"Competition Policy: Harnessing Private Interests for the Public Interest"	1990
Western Economics Association Annual Meetings	
"New Directions in Antitrust from a New Administration"	1990
"New Directions in Merger Enforcement: The View from Washington"	1990
Woodrow Wilson School Alumni Colloquium	
"Microeconomic Policy Analysis and Antitrust--Washington 1990"	1990
Arnold & Porter Lecture Series	
"Advocating Competition"	1991
"Antitrust Enforcement"	1990
ABA Antitrust Section Convention	
"Recent Developments in Market Definition and Merger Analysis"	1990
Federal Bar Association	
"Joint Production Legislation: Competitive Necessity or Cartel Shield?"	1990
Pew Charitable Trusts Conference	
"Economics and National Security"	1990
ABA Antitrust Section Midwinter Council Meeting	
"Fine-tuning the Merger Guidelines"	1990
"The State of the Antitrust Division"	1991
International Telecommunications Society Conference	
"Discussion of the Impact of Telecommunications in the UK"	1989
The Economists of New Jersey Conference	
"Recent Perspectives on Regulation"	1989
Conference on Current Issues Challenging the Regulatory Process	
"Innovative Pricing and Regulatory Reform"	1989
"Competitive Wheeling"	1989
Conference Board: Antitrust Issues in Today's Economy	
"Foreign Trade Issues and Antitrust"	1989

McKinsey & Co. Mini-MBA Conference	
"Economic Analysis of Pricing, Costing, and Strategic Business Behavior"	1989
	1994
Olin Conference on Regulatory Mechanism Design	
"Revolutions in Regulatory Theory and Practice: Exploring The Gap"	1989
University of Dundee Conference on Industrial Organization and Strategic Behavior	
"Mergers in Differentiated Product Industries"	1988
Leif Johanson Lectures at the University of Oslo	
"Normative Issues in Industrial Organization"	1988
Mergers and Competitiveness: Spain Facing the EEC	
"Merger Policy"	1988
"R&D Joint Ventures"	1988
New Dimensions in Pricing Electricity	
"Competitive Pricing and Regulatory Reform"	1988
Program for Integrating Economics and National Security: Second Annual Colloquium	
"Arming Decisions Under Asymmetric Information"	1988
European Association for Research in Industrial Economics	
"U.S. Railroad Deregulation and the Public Interest"	1987
"Economic Rationales for the Scope of Privatization"	1989
"Discussion of Licensing of Innovations"	1990
Annenberg Conference on Rate of Return Regulation in the Presence of Rapid Technical Change	
"Discussion of Regulatory Mechanism Design in the Presence of Research, Innovation, and Spillover Effects"	1987
Special Brookings Papers Meeting	
"Discussion of Empirical Approaches to Strategic Behavior"	1987
"New Merger Guidelines"	1990
Deregulation or Regulation for Telecommunications in the 1990's	
"How Effective are State and Federal Regulations?"	1987

Conference Board Roundtable on Antitrust	
"Research and Production Joint Ventures"	1990
"Intellectual Property and Antitrust"	1987
Current Issues in Telephone Regulation	
"Economic Approaches to Market Dominance: Applicability of Contestable Markets"	1987
Harvard Business School Forum on Telecommunications	
"Regulation of Information Services"	1987
The Fowler Challenge: Deregulation and Competition in The Local Telecommunications Market	
"Why Reinvent the Wheel?"	1986
World Bank Seminar on Frontiers of Economics	
"What Every Economist Should Know About Contestable Markets"	1986
Bell Communications Research Conference on Regulation and Information	
"Fuzzy Regulatory Rules"	1986
Karl Eller Center Forum on Telecommunications	
"The Changing Economic Environment in Telecommunications: Technological Change and Deregulation"	1986
Railroad Accounting Principles Board Colloquium	
"Contestable Market Theory and ICC Regulation"	1986
Canadian Embassy Conference on Current Issues in Canadian -- U.S. Trade and Investment	
"Regulatory Revolution in the Infrastructure Industries"	1985
Eagleton Institute Conference on Telecommunications in Transition	
"Industry in Transition: Economic and Public Policy Overview"	1985
Brown University Citicorp Lecture	
"Logic of Regulation and Deregulation"	1985
Columbia University Communications Research Forum	
"Long Distance Competition Policy"	1985
American Enterprise Institute Public Policy Week	
"The Political Economy of Regulatory Reform"	1984

MIT Communications Forum "Deregulation of AT&T Communications"	1984
Bureau of Census Longitudinal Establishment Data File and Diversification Study Conference "Potential Uses of The File"	1984
Federal Bar Association Symposium on Joint Ventures "The Economics of Joint Venture Assessment"	1984
Hoover Institute Conference on Antitrust "Antitrust for High-Technology Industries"	1984
NSF Workshop on Predation and Industrial Targeting "Current Economic Analysis of Predatory Practices"	1983
The Institute for Study of Regulation Symposium: Pricing Electric, Gas, and Telecommunications Services Today and for the Future "Contestability As A Guide for Regulation and Deregulation"	1984
University of Pennsylvania Economics Day Symposium "Contestability and Competition: Guides for Regulation and Deregulation"	1984
Pinhas Sapir Conference on Economic Policy in Theory and Practice "Corporate Governance and Market Structure"	1984
Centre of Planning and Economic Research of Greece "Issues About Industrial Deregulation"	1984
	"Contestability: New Research Agenda" 1984
Hebrew and Tel Aviv Universities Conference on Public Economics "Social Welfare Dominance Extended and Applied to Excise Taxation"	1983
NBER Conference on Industrial Organization and International Trade "Perspectives on Horizontal Mergers in World Markets"	1983
Workshop on Local Access: Strategies for Public Policy "Market Structure and Government Intervention in Access Markets"	1982
NBER Conference on Strategic Behavior and International Trade "Industrial Strategy with Committed Firms: Discussion"	1982

Columbia University Graduate School of Business, Conference on Regulation and New Telecommunication Networks	
"Local Pricing in a Competitive Environment"	1982
International Economic Association Roundtable Conference on New Developments in the Theory of Market Structure	
"Theory of Contestability"	1982
"Product Development, Investment, and the Evolution of Market Structures"	1982
N.Y.U. Conference on Competition and World Markets: Law and Economics	
"Competition and Trade Policy--International Predation"	1982
CNRS-ISPE-NBER Conference on the Taxation of Capital	
"Welfare Effects of Investment Under Imperfect Competition"	1982
Internationales Institut für Management und Verwaltung Regulation Conference	
"Welfare, Regulatory Boundaries, and the Sustainability of Oligopolies"	1981
NBER-Kellogg Graduate School of Management Conference on the Econometrics of Market Models with Imperfect Competition	
"Discussion of Measurement of Monopoly Behavior: An Application to the Cigarette Industry"	1981
The Peterkin Lecture at Rice University	
"Deregulation: Ideology or Logic?"	1981
FTC Seminar on Antitrust Analysis	
"Viewpoints on Horizontal Mergers"	1982
"Predation as a Tactical Inducement for Exit"	1980
NBER Conference on Industrial Organization and Public Policy	
"An Economic Definition of Predation"	1980
The Center for Advanced Studies in Managerial Economics Conference on The Economics of Telecommunication	
"Pricing Local Service as an Input"	1980
Aspen Institute Conference on the Future of the Postal Service	
"Welfare Economics of Postal Pricing"	1979
Department of Justice Antitrust Seminar	
"The Industry Performance Gradient Index"	1979

Eastern Economic Association Convention	
"The Social Performance of Deregulated Markets for Telecommunications Services"	
Industry Workshop Association Convention	
"Customer Equity and Local Measured Service"	1979
Symposium on Ratemaking Problems of Regulated Industries	
"Pricing Decisions and the Regulatory Process"	1979
Woodrow Wilson School Alumni Conference	
"The Push for Deregulation"	1979
NBER Conference on Industrial Organization	
"Intertemporal Sustainability"	1979
World Congress of the Econometric Society	
"Theoretical Industrial Organization"	1980
Institute of Public Utilities Conference on Current Issues in Public Utilities Regulation	
"Network Access Pricing"	1978
ALI-ABA Conference on the Economics of Antitrust	
"Predatoriness and Discriminatory Pricing"	1978
AEI Conference on Postal Service Issues	
"What Can Markets Control?"	1978
University of Virginia Conference on the Economics of Regulation	
"Public Interest Pricing"	1978
DRI Utility Conference	
"Marginal Cost Pricing in the Utility Industry: Impact and Analysis"	1978
International Meeting of the Institute of Management Sciences	
"The Envelope Theorem"	1977
University of Warwick Workshop on Oligopoly	
"Industry Performance Gradient Indexes"	1977
North American Econometric Society Convention	
"Intertemporal Sustainability"	1979
"Social Welfare Dominance"	1978
"Economies of Scope, DAIC, and Markets with Joint Production"	1977

Telecommunications Policy Research Conference	
"Transition to Competitive Markets"	1986
"InterLATA Capacity Growth, Capped NTS Charges and Long Distance Competition"	1985
"Market Power in The Telecommunications Industry"	1984
"FCC Policy on Local Access Pricing"	1983
"Do We Need a Regulatory Safety Net in Telecommunications?"	1982
"Anticompetitive Vertical Conduct"	1981
"Electronic Mail and Postal Pricing"	1980
"Monopoly, Competition and Efficiency": Chairman	1979
"A Common Carrier Research Agenda"	1978
"Empirical Views of Ramsey Optimal Telephone Pricing"	1977
"Recent Research on Regulated Market Structure"	1976
"Some General Equilibrium Views of Optimal Pricing"	1975
National Bureau of Economic Research Conference on Theoretical Industrial Organization	
Discussion of "Compensating Variation as a Measure of Welfare Change"	1976
Conference on Pricing in Regulated Industries: Theory & Application	
"Ramsey Optimal Pricing of Long Distance Telephone Services"	1977
NBER Conference on Public Regulation	
"Income Distributional Concerns in Regulatory Policy-Making"	1977
Allied Social Science Associations National Convention	
"Merger Guidelines and Economic Theory"	1990
Discussion of "Competitive Rules for Joint Ventures"	1989
"New Schools in Industrial Organization"	1988
"Industry Economic Analysis in the Legal Arena"	1987
"Transportation Deregulation"	1984
Discussion of "Pricing and Costing of Telecommunications Services"	1983
Discussion of "An Exact Welfare Measure"	1982
"Optimal Deregulation of Telephone Services"	1982
"Sector Differentiated Capital Taxes"	1981
"Economies of Scope"	1980
"Social Welfare Dominance"	1980
"The Economic Definition of Predation"	1979
Discussion of "Lifeline Rates, Succor or Snare?"	1979
"Multiproduct Technology and Market Structure"	1978
"The Economic Gradient Method"	1978
"Methods for Public Interest Pricing"	1977
Discussion of "The Welfare Implications of New Financial Instruments"	1976
"Welfare Theory of Concentration Indices"	1976

Discussion of "Developments in Monopolistic Competition Theory"	1976
"Hedonic Price Adjustments"	1975
"Public Good Attributes of Information and its Optimal Pricing"	1975
"Risk Invariance and Ordinally Additive Utility Functions"	1974
"Consumer's Surplus: A Rigorous Cookbook"	1974
University of Chicago Symposium on the Economics of Regulated Public Utilities	
"Optimal Prices for Public Purposes"	1976
American Society for Information Science	
"The Social Value of Information: An Economist's View"	1975
Institute for Mathematical Studies in the Social Sciences Summer Seminar	
"The Sustainability of Natural Monopoly"	1975
U.S.-U.S.S.R. Symposium on Estimating Costs and Benefits of Information Services	
"The Evaluation of the Economic Benefits of Productive Information"	1975
NYU-Columbia Symposium on Regulated Industries	
"Ramsey Optimal Public Utility Pricing"	1975

Research Seminars:

Bell Communications Research (2)	University of California, San Diego
Bell Laboratories (numerous)	University of Chicago
Department of Justice (3)	University of Delaware
Electric Power Research Institute	University of Florida
Federal Reserve Board	University of Illinois
Federal Trade Commission (4)	University of Iowa (2)
Mathematica	Universite Laval
Rand	University of Maryland
World Bank (3)	University of Michigan
Carleton University	University of Minnesota
Carnegie-Mellon University	University of Oslo
Columbia University (4)	University of Pennsylvania (3)

Cornell University (2)
Georgetown University
Harvard University (2)
Hebrew University
Johns Hopkins University (2)
M. I. T. (4)
New York University (4)
Northwestern University (2)
Norwegian School of Economics and
Business Administration

University of Toronto
University of Virginia
University of Wisconsin
University of Wyoming
Vanderbilt University
Yale University (2)
Princeton University (many)
Rice University
Stanford University (5)
S.U.N.Y. Albany

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:)	
)	
Applications for Consent to the)	
Transfer of Control of Licenses of)	
)	
MediaOne Group, Inc.,)	CS Docket No. 99-251
Transferor)	
)	
To)	
)	
AT&T Corp.,)	
Transferee)	

DECLARATION OF NANCY MCGEE

1. My name is Nancy McGee. I am Vice President – Digital Telephone Services Marketing at MediaOne Group, Inc. (“MediaOne”). I am responsible for product development and management for MediaOne’s efforts to provide telephony services in the United States.
2. I am submitting this declaration in support of the pending application for FCC approval of the various license transfers associated with the merger of AT&T Corp. (“AT&T”) and MediaOne. The purpose of my affidavit is to respond to claims by incumbent local telephone monopolists (“ILECs”) that the merger will not help MediaOne compete with these ILECs. As I explain below, the combination of AT&T’s and MediaOne’s complementary assets will allow the combined entity to compete far more effectively with the dominant ILECs than either company could acting alone.

3. MediaOne is the third largest cable company in the United States. At the end of 1998, MediaOne's domestic cable television systems passed approximately 8.5 million homes and provided service to approximately 5 million subscribers. MediaOne is spending billions of dollars to upgrade its traditional, one-way analog cable systems to two-way, digital, high capacity broadband facilities capable of providing local telephony and other services.

4. In 1998, MediaOne began offering facilities-based local telephone service in six of its markets – Atlanta, Georgia, Los Angeles, California, Jacksonville and Pompano, Florida, Boston, Massachusetts, and Richmond, Virginia. Pursuant to our plans prior to the merger with AT&T, MediaOne also has launched local telephone service in Detroit, Michigan, this year and continues to plan a St. Paul, Minnesota, launch shortly if we are able to obtain necessary interconnection arrangements with U S WEST. MediaOne offers local telephone service to customers at rates well below comparable services offered by the incumbent LEC providers in each area where we provide telephone service. For specific details, please refer to the attached chart, depicting MediaOne and ILEC rates for comparable services.

5. Notwithstanding aggressive marketing efforts, MediaOne's telephony penetration rate, more than a year after launch, is less than 3% across all of the markets where we offer service. This means that even in homes ready for its circuit

switched cable telephony, just about three out of every 100 of MediaOne's potential customers subscribed to its telephone service.

6. The merger with AT&T will result in much faster and more effective deployment of MediaOne's upgraded assets and will allow AT&T and MediaOne to achieve local telephony penetration rates more commensurate with our investment and progress in upgrading our cable systems. MediaOne has faced a number of obstacles to entering and penetrating the local telephony market to a level that could create meaningful competition to the incumbent LECs. Many of these obstacles can be overcome by the merger with AT&T and the complementary nature of MediaOne's and AT&T's assets and expertise.

7. Because local telephone service is considered a "lifeline" service by most people, consumers generally want to receive service from an established telephone company. A new entrant without an established reputation as a provider of telephone services has a particularly difficult time convincing customers to switch. MediaOne's experience has confirmed that even a well-established and respected cable company such as MediaOne faces significant difficulty in generating consumer confidence as a provider of telephone services. One key reason that customers are reluctant to switch from their current provider to MediaOne for telephone service is skepticism that a "cable company" can provide top-grade service. Evidence that RBOCs do not consider MediaOne to be a significant competitive threat can be found in BellSouth's decision to *raise* its prices following MediaOne's launch of telephone service in Atlanta. BellSouth

raised its price for one residential line with a full feature set despite MediaOne undercutting its original rate by a substantial amount. That behavior stands in sharp contrast to SBC's reaction to AT&T's offering in Fremont, California, where SBC has announced it will provide a full voice, video, and data service offering to compete with AT&T's.

8. Consumers view telephone companies as having a greater reputation for quality and service than cable companies. For example, a recent survey conducted by the Yankee Group disclosed that the number of customers rating long distance company service as excellent was more than twice as high as their rating of cable television service. As between AT&T and MediaOne, surveys have shown that AT&T has a much stronger brand image, including a higher quality and service rating, and is considered more of a leader in the market for telephone services. MediaOne has conducted research that disclosed that a significant percentage of customers would purchase telephony services from AT&T who would not do so from MediaOne as a standalone provider. Thus, through the merger, MediaOne will immediately benefit from AT&T's strong telephony brand, and AT&T and MediaOne can use MediaOne's local network to enable AT&T to provide facilities-based local telephone service without the delays and pitfalls that could arise from AT&T's designing and constructing such a local network from scratch.

9. AT&T also has extensive technical and engineering expertise in the telephone industry, as well as telephone marketing and customer care expertise, from

which MediaOne's telephony efforts can benefit. Through the merger, MediaOne will gain AT&T's expertise in managing sophisticated telephone networks, and access to AT&T's highly sophisticated marketing and customer care organizational structures, which are capable of quickly responding to customer demands on a large-scale basis. Here, it is important to recognize that complex customer care is a much bigger part of the telephone business than of the cable business. MediaOne is in the process of implementing the large scale operational support systems that will be necessary to provide the best possible services to customers in competition with incumbent LECs. However, deployment of these systems is expensive and very time consuming before they can be fully operational and personnel can become proficient in their use. The merger will immediately enhance MediaOne's telephony offerings by combining MediaOne's upgraded cable facilities with AT&T's brand, expertise, and customer care capabilities in telephony.

10. Standing alone, MediaOne's business plan projects only a modest local telephony penetration rate in the coming years, one which will not unseat the ILECs from their current dominant position. With the merger, in contrast, the combined AT&T/MediaOne can be competitive much more quickly and far more broadly than either could alone and can in short order pose a serious competitive threat to dominant ILECs.

11. AT&T's experience and resources will also provide important benefits in the critical area of negotiating – and litigating – with the recalcitrant incumbent LECs with whom MediaOne must interconnect so that its customers will

have any-to-any calling capability. As MediaOne has explained to the Commission on numerous occasions, MediaOne's efforts to penetrate local telephone markets continue to be enormously frustrated by the ILECs. Problems have arisen in the areas of interconnection, number portability, access to new telephone numbers, access to wiring in multiple dwelling units, and access to ancillary services, such as directory assistance, support services, repair, and intraLATA toll service. For example, Pacific Bell and Bell Atlantic have refused to honor their interconnection agreements with MediaOne, thereby impeding MediaOne's access to crucial unbundled network elements. Certain ILECs have failed to promptly install trunking additions, causing severe service disruptions. Others have refused to provide message testing or signaling parameters, limiting the services MediaOne can offer. These difficulties directly hurt consumers, who receive lower quality and fewer features, and pay higher prices for local telephone service. AT&T's extensive experience in dealing with the RBOCs and others in these areas, as well as AT&T's considerable presence and resources in the telecommunications industry, will significantly bolster MediaOne's efforts in dealing and competing with the ILECs.

12. The merger also promises specific technological and architectural efficiencies. For example, MediaOne currently sends and receives traffic to and from AT&T primarily through ILEC tandem switches. After the merger, however, AT&T's extensive network infrastructure can be utilized to reduce MediaOne's dependency on the ILECs' infrastructure. Both companies also currently have development efforts underway with respect to future voice service platforms such as voice over IP. The

merger will be beneficial in that it will allow for a combination of resources and ideas in these promising new areas.

13. Finally, MediaOne brings much more to the table than its cable facilities, and MediaOne's experience and expertise should also make AT&T a more effective local telephony competitor in those areas that were formerly operated by TCI where AT&T is currently upgrading to two-way broadband capability. MediaOne has already upgraded half its cable systems, and has established local telephone networks in seven areas. AT&T will benefit from MediaOne's real world experience in using cable facilities to provide local telephone service, including our experience with the training and equipment required to install and maintain equipment at the customer's location.